

1 BROOKS R. BROWN (SBN 250724)  
*bbrown@goodwinlaw.com*  
2 W. KYLE TAYMAN (pro hac vice)  
*KTayman@goodwinlaw.com*  
3 **GOODWIN PROCTER LLP**  
4 901 New York Avenue NW  
Washington, DC 20001  
5 Tel.: +1 202 346 4000  
Fax.: +1 202 346 4444

6 LAURA A. STOLL (SBN 255023)  
7 *lstoll@goodwinlaw.com*  
**GOODWIN PROCTER LLP**  
8 601 S. Figueroa Street, 41st Floor  
9 Los Angeles, CA 90017  
Tel.: +1 213 426 2500  
Fax.: +1 213 623 1673

10 Attorneys for Defendant  
QUICKEN LOANS INC.

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

AMANDA HILL, individually and on behalf of all others similarly situated,

17 Plaintiff,

18 | V.

10 || QUICKEN LOANS INC.,

Defendant.

Case No. 5:19-cv-00163-FMO-SP

**DECLARATION OF W. KYLE  
TAYMAN IN SUPPORT OF  
QUICKEN LOANS INC.'S MOTION  
TO COMPEL ARBITRATION**

Date: May 16, 2019  
Time: 10:00 a.m.  
Courtroom: 6D  
Judge: Hon. Fernando M. Olguin  
350 W. 1st Street, 6th Floor,  
Los Angeles, CA 90012

Filed concurrently with:

1. Notice of Motion and Motion;
  2. Memorandum;
  3. Declaration of P Luthra;
  4. Declaration of M Viner; and
  5. Proposed Order

## **DECLARATION OF W. KYLE TAYMAN**

I, W. Kyle Tayman, declare as follows:

1. I am a partner with the law firm Goodwin Procter LLP and a member of the Massachusetts and District of Columbia bars. I have been admitted *Pro Hac Vice* in the above-captioned matter as counsel for Quicken Loans Inc. (“Quicken Loans”).

2. I make this declaration in support of Quicken Loans' Motion to Compel Arbitration. The facts set forth in this Declaration are of my own personal knowledge, and the information provided herein is true and correct to the best of my current knowledge, information and belief.

3. In connection with this lawsuit, my law firm ordered a title report from CT Lien Solutions for the residential property located at 35312 Frederick St, Wildomar, CA 92595 (the “Property”). According to the declaration of Mitch Viner in support of Quicken Loans’ Motion to Compel Arbitration, Plaintiff entered this address into websites supported by LMB Mortgage Services, Inc. (“LMB”) in October and November 2018.

4. Attached hereto as **Exhibit 1** is a true and correct copy of the chain of title guarantee on the Property that my firm received from CT Lien Solutions on April 15, 2019. Page 2 of Exhibit 1 shows that on October 24, 2017, Plaintiff Amanda Hill took out a mortgage loan from IMPAC Mortgage Corp. in the amount of \$352,600.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on April 15, 2019.

/s/ W. Kyle Tayman

W. KYLE TAYMAN